IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI

ARC CONTROLS, INC.,	§	
	§	
Plaintiff,	§	
V.	§	
	§	
M/V NOR GOLIATH, in rem, and	§	
GOLIATH OFFSHORE HOLDINGS PTE.	§	
LTD, in personam,	§	
	§	
Defendants.	§	
	§	CASE NO.: 1:19-CV-0391-LG-RHW
v.	§	
	§	IN ADMIRALTY
CYPRESS PIPELINE AND PROCESS	§	
SERVICES, LLC,	§ § §	
	§	
Plaintiff-in-Intervention,	§	
V.	§ §	
	§	
M/V NOR GOLIATH, in rem, and	§	
GOLIATH OFFSHORE HOLDINGS PTE.		
LTD, in personam,	§ § §	
Defendants-in-Intervention.	§	

UNOPPOSED MOTION FOR LEAVE TO FILE COMPLAINT IN INTERVENTION

NOW COMES Cypress Pipeline and Process Services, LLC ("Cypress"), who moves this Court for an Order permitting it to file the attached Complaint in Intervention. Undersigned counsel has conferred with counsel for Plaintiff, Arc Controls, Inc., and confirmed that Plaintiff does not oppose this Motion.

WHEREFORE, PREMISES CONSIDERED, Cypress Pipeline and Process Services, LLC respectfully requests the entry of an Order granting this Motion and authorizing Cypress to file the

attached Complaint in Intervention. Cypress requests such additional relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED, this the 18th day of July, 2019.

BUTLER SNOW LLP

By: /s/ Michael C. McCabe, Jr.

Michael C. McCabe, Jr. Mississippi Bar No.: 101548

Email: michael.mccabe@butlersnow.com

1300 25th Avenue, Suite 204

Gulfport, Mississippi 39502-4248

Telephone: 228-575-3025 Facsimile: 228-868-1531

ATTORNEYS FOR CYPRESS PIPELINE AND PROCESS SERVICES, LLC

OF COUNSEL:

Scott D. Marrs – Application to appear Pro Hac Vice forthcoming

Texas Bar No.: 13013400

Email: scott.marrs@akerman.com

Brian T. Bagley – Application to appear Pro Hac Vice forthcoming

Texas Bar No.: 24035541

Email: brian.bagley@akerman.com

James E. Rogers -- Application to appear Pro Hac Vice forthcoming

Texas Bar No.: 2405165

Email: james.rogers@akerman.com 1300 Post Oak Blvd., Suite 2500

Houston, Texas 77056 Telephone: 713-623-0887 Facsimile: 713-960-1527

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via the Court's electronic filing system on all counsel of record and/or via registered and regular U.S. Mail on this 18th day of July 2019.

/s/ Michael C. McCabe, Jr.
MICHAEL C. MCCABE, JR.